

**Peter M. Burrell**

**From:** Peter M. Burrell  
**Sent:** Tuesday, May 04, 2004 11:09 AM  
**To:** 'Michael Roberts'  
**Cc:** 'Beckwith\_Chambers@ohsd.uscourts.gov'  
**Subject:** RE: Jeffries v. Centre Life Insurance; C-1-02-351

Mike -- We have reviewed the proposed order and have the following comments. As you know, sealing the case was one aspect of the settlement the parties reached on April 19, 2004 when the settlement was read into the record. And, as noted in that record, we don't have an objection to sealing the case.

But it was our understanding that sealing the case would be addressed in the settlement agreement and would take place after the settlement agreement and release was finalized. I don't see why we can't get a working draft of an agreement together in short order so we can wrap this matter up. In fact, I thought you were going to put something together for our review. Since we should have something for our clients to review, I will put together a working draft and get it to you for review. Hopefully, we can then have something in final form within the next week to 10 days and get everything squared away at the same time. Peter

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-----Original Message-----

From: Michael Roberts [mailto:[mroberts@Graydon.com](mailto:mroberts@Graydon.com)]  
 Sent: Friday, April 30, 2004 10:30 AM  
 To: Lisa Hill; Beckwith\_Chambers@ohsd.uscourts.gov  
 Cc: Michael Roberts; Peter M. Burrell; William R. Ellis  
 Subject: Re: Jeffries v. Centre Life Insurance; C-1-02-351

Judge Beckwith:

I prepared the Stipulation based on our 4/19 discussion and agreement in Court. But in fairness, since I have had no further dialogue with Mr. Ellis on the issue, I'd like you to await Mr. Ellis' reply to this message before executing the Order.

Respectfully, Mike Roberts

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>>> Lisa Hill 04/30/04 10:14AM >>>

Dear Judge Beckwith:

Thank you.

Lisa Hill  
Paralegal  
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